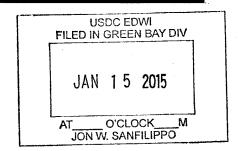
### UNITED STATES DISTRICT COURT

### EASTERN DISTRICT OF WISCONSIN



UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

JOHN P. GREENLEAF (d.o.b. xx/xx/80)

CASE NUMBER: 15-M-606

I, Gerald Mullen, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

**Count One** On or about November 9, 2014, in the State and Eastern District of Wisconsin and elsewhere, John P. Greenleaf knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, that had been mailed, shipped and transported in and affecting interstate and foreign commerce; and which contained material which had been shipped, and transported by a means and facility of interstate and foreign commerce, including by computer.

Count Two On or about November 14, 2014, in the State and Eastern District of Wisconsin and elsewhere, John P. Greenleaf knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, that had been mailed, shipped and transported in and affecting interstate and foreign commerce; and which contained material which had been shipped, and transported by a means and facility of interstate and foreign commerce, including by computer.

Count Three On or about January 15, 2015, in the State and Eastern District of Wisconsin and elsewhere, John P. Greenleaf knowingly possessed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained material which had been shipped, and transported by a means and facility of interstate and foreign commerce, including by computer.

I further state that I am a Federal Bureau of Investigation Special Agent and this complaint is based on the following facts: Please see the attached affidavit.

Sworn to before me and subscribed in my presence,

Date at Green Bay, Wisconsin

The Honorable William C. Griesbach United States District Court Judge

Name & Title of Judicial Officer

Signature of Judicial Officer

# AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT & ARREST WARRANT

Gerald Mullen, being first duly sworn, states that:

## **Background**

- 1. I have been employed as a Special Agent of the FBI since August 1996, and am currently assigned to the Green Bay Resident Agency, Wisconsin. While employed by the FBI, I have investigated federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography. I have gained experience through training at seminars, classes, discussions with other knowledgeable agents and everyday work related to conducting these types of investigations. I have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media.
  - 2. I am aware of the following federal statutes concerning child pornography:
  - a. 18 U.S.C. § 2252A(a)(2)(A) and (b)(1) prohibits a person from knowingly receiving or distributing, or attempting or conspiring to receive or distribute, any child pornography or any material that contains child pornography, as defined in 18 U.S.C. § 2256(8), that has been mailed, or using any means or facility of interstate or foreign commerce shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.
  - b. 18 U.S.C. § 2252A(a)(5)(B) and (b)(2) prohibits a person from knowingly possessing or knowingly accessing with intent to view, or attempting or conspiring to do so, any material that contains an image of child pornography, as defined in 18 U.S.C. § 2256(8), that has been mailed, or shipped or transported using any means or facility of

interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that have been mailed or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

# **Basis for Information in Affidavit**

3. The statements contained in this affidavit are based in part on the following: information provided by FBI Special Agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by federal agents; independent investigation and analysis by FBI agents/analysts and computer forensic professionals; and my experience, training and background as a Special Agent (SA) with the FBI. This affidavit includes only those facts that I believe are necessary to establish probable cause and does not include all of the facts uncovered during the investigation. Based on my investigation and the information supplied to me by other law enforcement personnel, I have probable cause to believe the following regarding Thomas Gervais, dob XX/XX/69.

# **Facts Establishing Probable Cause**

4. I am aware that between the dates of October 5, 2014 and November 14, 2014, OCE-5023 successfully completed downloads of 16 child pornography files from the computer at IP address XX. XXX.XX.174, on five separate undercover sessions. From the time of the first session on October 5, 2014 up to November 14, 2014, the number of suspected child pornography files available for download from the computer at the IP address XX.XXX.XX.174 increased from 1 file to 1,916 files. The following are some of the files downloaded from the computer at IP

# address XX.XXX.XX.174 by OCE-5023 during these sessions:

**File Name:** 10 yearold Plays with older Man Underage (pthc) (r@ygold) (hussyfan)

(babyshivid).mpg

Download date: October 5, 2014

Sha1 Hash Value: KZG7NLKZKNODHKCOSXAWBUCQGCPQ7YIJ

**Description:** This video file is approximately 2 minutes in length. The video starts off showing a prepubescent female child that is completely naked. Her arms are being held by a naked adult male. The adult male is sliding the child down his body so that she rubs against his semi-erect penis. As the video progresses, the female child begins to stroke the adult male's penis with her hands. The female child eventually attempts to put the adult male's penis into her vagina.

File Name: 2.jpg

Download date: November 9, 2014

Sha1 Hash Value: 3JX4ATUJK3T7WL4ZARH75LL5YRRHE7V

**Description:** This is an image file that depicts a prepubescent female child who is completely naked seated on a bed. The female child has her hand wrapped around an

adult male's exposed erect penis.

File Name: cumshot on 3 yr old girl preteen child underage pedo baby incest

reelkiddymov(1)(1)(1).jpg

Download date: November 9, 2013

Sha1 Hash Value: JY7WOMEQROI3J3ZIUFERURXIU2BERMIN

**Description:** This is an image file that depicts a prepubescent female child lying down on her back. The child is completely naked from the waist down. An adult male has his erect penis pressed against the child's vagina. It appears that the adult male has ejaculated on the female child.

File Name: Z 5 Yr Daddy Fucks Me In The Ass Preteen Child Underage Pedo Baby

*Incest Reelkiddymov(1).jpg* 

Download date: November 14, 2014

Sha1 Hash Value: ESRNJ7OH2DLMBRZWJJ36B5EA4WRBRKES

**Description:** This is an image file that depicts a prepubescent female child lying down on her stomach. The child has her bare buttock exposed. An adult male is positioned behind her and is penetrating the child's vagina or anus with his erect penis.

File Name: 2-2. jpg

Download date: November 14, 2014

Sha1 Hash Value: MOLSA6VPVJ7KLFSLSWO6XDAE6Q3KJQQY

**Description:** This is an image file that depicts a prepubescent female child that is

performing fellatio upon and adult male.

- 5. On November 12, 2014, OCE-5023 submitted the hash values of the files that were being shared by the computer at IP address XX.XXX.XX.174 (from the November 9, 2014 undercover session) to the National Center for Missing and Exploited Children Portal. Of the 1,049 hash values submitted, 323 came back to files of a previously identified child victims.
- 6. On October 5, 2014, a DNS check on the IP address XX.XXX.XXX.174 was conducted through the American Registry for Internet Numbers (ARIN) which reported that the IP address XX.XXX.XX.174 is registered to Comcast Cable Communications. On October 27, 2014, Comcast Cable Communications responded to a subpoena requesting subscriber information regarding IP addresses XX.XXX.XX.174 on the date and times that child pornography were downloaded by OCE-5023. Comcast Cable Communications provided the following subscriber information for said IP address: M.W., address of 11XX Manila Street, Manitowoc, Wisconsin, 54220.
- 7. On January 14, 2015, I obtained a federal search warrant for the premises located at 11XX Manila Street, Manitowoc, Wisconsin. I executed that warrant on January 15, 2015 and made contact with M.W. at that address. I learned that M.G. and John P. Greenleaf resided in the upper unit of the residence. On January 15, I applied for and received a search warrant for the upper unit to that residence. That search warrant was also executed on January 15, 2015.
- 8. Upon executing that warrant on the upper unit, I am aware that FBI Special Agents seized numerous electronic items including computers and hard drives that were later found to contain images of child pornography. Specifically:

**File Name**: Real Private Daughter (CD Found On Landfill) Stolen Pedo Lolita Pthc Hussyfan Preteen Nude (12-1.jpg). This is an image file that depicts a pubescent female child lying on a bed. The female child is completely naked. There is a pen that is inserted into her vagina.

**File Name:** Sex Fun 6 Yo Girl Incest Bathroom Trained Sexkd Steve Preston Of Fla-Reelkiddy – Child Bondage Porn Kiddy Underage Ille~1.jpg. This is an image file that depicts a prepubescent female child performing fellatio upon an adult male's exposed erect penis.

**File Name:** *Pedo\_Suck049.jpg* This is an image file that depicts a prepubescent female child performing fellatio upon an adult male's exposed erect penis. The child is lying on a bed wearing only knee high stockings.

9. I am further aware that law enforcement located John P. Greenleaf at his place of employment in Manitowoc County, transported him to Manitowoc Police Department and interviewed him. Greenleaf was advised of his *Miranda* rights and waived same. Greenleaf stated that he had been collecting and downloading child pornography from the internet for over 10 years. He was obtaining the child pornography by using peer to peer file sharing programs and email. The last time he claimed that he obtained child pornography was in late December 2014. Greenleaf estimated that he may have 1,000 child pornography movie/image files. He did this via a laptop at the upper apartment he shares with M.G. Greenleaf said that the peer to peer software allowed him to receive and distribute child pornography files via a shared file folder. He used search terms such as PTHC and PTSC. Greenleaf said he was sexually attracted to 12-year old females and older.

10. Based upon the foregoing information, I believe there is probable cause to believe that John P. Greenleaf received, distributed and possessed images of child pornography in violation of 18 U.S.C. § 2252A on the above referenced dates.

Merold E. Mullen
Affiant Gerald Mullen

Subscribed and sworn to before me

this 15th day of January, 2015.

Notary Public

My commission expires: permanent.